

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

RUSSEL H. DAWSON, Personal
Representative of the Estate of Damaris
Rodriguez; REYNALDO GIL; JOSE MARTE,
A.G., I.G., S.G. and D.G.,

Plaintiffs,

v.

SOUTH CORRECTIONAL ENTITY
("SCORE"), a Governmental Administrative
Agency; PENNY BARLEY; JIM KELLY;
TODD BARKER; BRITTNEY PALMORE;
BRANDON HEATH; PEDRO SANTOS;
MANDI JARAMILLO; WILLIAM WOO;
BENDA SCOTT a/k/a BRENDA SCOTT;
ETHAN GLOVER; CHRISTOPHER FOY;
JANE DORE; COLMINTON ALLEN;
AARON SEIPP; SCORE JOHN DOES 1-10;
NAPHCARE, INC., an Alabama Corporation;
REBECCA VILLACORTA; HENRY TAMBE;
NANCY WHITNEY; BILLIE STOCKTON;
BRITTANY MARTIN; JESSICA LOTHROP;
BROOKE WALLACE; SALLY MUKWANA;
JOAN KOSANKE; RITA WHITMAN;
VIRGINIA RICHARDSON; NAPHCARE
JOHN DOES 1-10; ; KING COUNTY, a
political subdivision of the State of Washington;
RAUL ADAMS; LELAND ADAMS; ALAN
TAG,

Defendants.

•NO. 2:19-cv-01987-RSM

**STIPULATED MOTION AND ORDER
FOR PARTIAL EXTENSION OF
DISCOVERY CUT OFF AND
EXTENSION OF DISPOSITIVE
MOTION DEADLINE**

NOTE ON MOTION CALENDAR: June
21, 2021

Pursuant to Fed.R.Civ.P. 6(b) and LR 16(b)(6), the parties, by and through their
respective counsel, hereby stipulate to (1) a partial extension of the discovery cutoff to
accommodate the remaining depositions that the parties have already scheduled or agreed to

1 schedule and (2) a one week extension of the deadline for filing dispositive motions. The
2 current discovery cutoff is June 14, 2021, and the current deadline for filing dispositive
3 motions is July 13, 2021. (*See* ECF No. 69).

4 The parties make these requests for the following reasons:

5 1. The parties have conducted 29 depositions in this case since March of this year,
6 and have worked diligently to accommodate all parties' and the witnesses' scheduling
7 concerns.

8 2. Due to delays caused by COVID-19, the complexity of the fact pattern, personal
9 emergencies, and other discovery disputes that have been amicably resolved, the following
10 depositions have not yet been taken:

11 a. Rebecca Luethy, RN (expert) - Ms. Luethy's deposition is currently scheduled
12 for 6/22/2021.

13 b. Virginia Richardson (defendant) - Ms. Richardson's deposition is currently
14 scheduled for 6/22/2021.

15 c. Rick Lichten (expert) - Mr. Lichten's deposition is currently scheduled for
16 6/23/2021.

17 d. Rita Whitman (defendant) - Ms. Whitman's deposition is currently scheduled
18 for 6/23/2021.

19 e. Martin Horn (expert) - Mr. Horn's deposition is currently scheduled for
20 6/25/2021.

21 f. Greg Davis, MD (expert) - Dr. Davis's deposition is currently scheduled for
22 7/8/2021.

23 g. Jennifer Piel, MD (expert) - Dr. Piel's deposition is currently scheduled for
24 7/13/2021.

25 h. Gary Vilke, MD (expert) - Dr. Vilke's deposition was previously scheduled but
26 cancelled due to logistical complications. The parties are in the process of
27 rescheduling.

- i. Carl Wigren, MD (expert) - Dr. Wigren's deposition was previously scheduled but cancelled due to an attorney's personal emergency. The parties are in the process of rescheduling.
- j. Mandi Jaramillo (defendant) - Ms. Jaramillo's deposition was previously scheduled but cancelled due to a related discovery dispute, which has since been resolved. The parties are in the process of rescheduling.
- k. NaphCare 30(b)(6) witnesses. The noting party and NaphCare have met and conferred on this deposition and are in the process of scheduling.
- l. SCORE 30(b)(6) witnesses. The parties have not yet met and conferred on this deposition.
- m. Devon Schrum, Adam Munson, and Kevin Milosevich are SCORE employees whose depositions were requested before the discovery cutoff but have not yet been scheduled. Counsel for SCORE has not agreed that Devon Schrum or Kevin Milosevich should be deposed and this will be the subject of further consultation among counsel.

3. Due to witness scheduling conflicts, the parties were unable to schedule the deposition of Jennifer Piel, MD until 7/13/2021. The parties agree that the deposition of Dr. Piel may be relevant to dispositive motions and that a one week extension of the deadline for filing dispositive motions is necessary so that the parties may consider Dr. Piel's testimony before bringing any dispositive motions.

4. The parties agree and stipulate that, due to the foregoing,

- a. The discovery cutoff shall be extended to accommodate the matters listed above only.
- b. The deadline for filing dispositive motions shall be extended to 7/20/2021.

The parties will make a good faith effort to complete the above-identified discovery as soon as possible.

1 IT IS SO STIPULATED:

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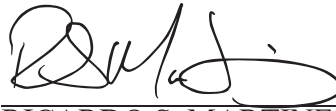
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Attorneys for the SCORE Defendants

1 **ORDER**

2 IT IS HEREBY ORDERED that, based on the stipulation of the parties, and for good
3 cause being shown, the case schedule will be amended to reflect a partial extension of the
4 discovery cut-off to accommodate the currently scheduled depositions, and a dispositive
5 motion deadline of July 20, 2021, as set forth above. All other dates set in this matter remain
6 unchanged.

7 DATED this 25th day of June, 2021.

8 

9
10 RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the below date, I served STIPULATED MOTION AND ORDER FOR PARTIAL EXTENSION OF DISCOVERY CUT OFF AND EXTENSION OF DISPOSITIVE MOTION DEADLINE on the following attorneys via USDC efilng service to the last known email address of record as follows:

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Dated this 21st day of June, 2021.

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